



The New York Times
Company

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April 21, 2025

The Hon. Dale E. Ho
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: U.S. v. Adams, 24-cr-00556-DEH, Request to Unseal Search
Warrant Materials

Dear Judge Ho:

I write on behalf of The New York Times Company (“The Times”) in respect to our letter motion of February 18, 2025 (the “Motion,” Dkt. 133) seeking the public release of certain materials related to searches conducted in the above-referenced action (the “Materials”). By an Order (Dkt. 179), the Court directed the parties to submit any opposition papers by April 17, 2025. No opposition papers have been filed, and we therefore respectfully ask the Court to proceed with the release of the Materials sought by the Motion.

Timing is a critical concern here. The mayoral race is proceeding, with the Democratic primary scheduled for June 24, 2025. The Materials to be released will undoubtedly contain much information of relevance to many voters as they consider the candidates for mayor, including Mayor Adams, who is now running as an independent. Because there will be no trial in this matter, these Materials are uniquely important in showing whether there was a credible criminal case being prosecuted by the Government (as the former prosecutors on the case say) or whether the prosecution was tainted by politics (as the new attorney general and Mayor Adams have said). We respectfully request that in light of the ongoing mayoral campaign the Materials be released expeditiously and, if need be, on a rolling basis.

By way of reminder, the Materials are copies of certain search warrants and search warrant applications, an application for a 2703(d) order, and the document indexes compiled by the Government in submitting evidentiary items to the defense, as set forth in the Government's January 6, 2025 Opposition to the Defense Motion for a Bill of Particulars (the "Opposition," Dkt. 89). More specifically, we seek:

- (a) "Search warrants and detailed 100+ page affidavits identifying and describing evidence";
- (b) All discovery indexes created by the Government, as referenced in the Opposition. As of December 4, 2024 the Government had made nine productions, each with an index;
- (c) A December 2021 application for a 2703(d) order; and
- (d) An August 2024 application for a warrant for location data for Mayor Adams's cell phone.

(See Opposition, Dkt. 89, at pp. 2-3, 13.)

We thank the Court for its consideration.

Respectfully submitted,

David McCraw

David E. McCraw

cc: Counsel of Record (via ECF)